

EXHIBIT A

1 UNITED STATES DISTRICT COURT
2 WESTERN DISTRICT OF WASHINGTON
3 AT SEATTLE
4

JOHN DOE, et al.,) Case No. C17-0178JLR

5)
Plaintiffs,)

6)
v.)

7)
DONALD TRUMP, et al.,)

8)
Defendants.)

9 -----)
JEWISH FAMILY SERVICES,)
10 et al.,)

11)
Plaintiffs,)

12)
v.)

13)
DONALD TRUMP, et al.,)

14)
Defendants.)
-----)

15 - - -
16 Wednesday, February 13, 2019
17 - - -

18 Deposition of JENNIFER B. HIGGINS, taken at the
19 offices of Skadden Arps Slate Meagher & Flom, LLP,
20 1440 New York Ave NW, Washington, D.C. beginning at
21 8:59 a.m., before Nancy J. Martin, a Registered Merit
22 Reporter, Certified Shorthand Reporter.

1 WASHINGTON, D.C., WEDNESDAY, FEBRUARY 13, 2019;

2 8:59 A.M.

3 - - -

4 JENNIFER B. HIGGINS,

5 having been first duly sworn/affirmed,

6 was examined and testified as follows:

7
8 EXAMINATION

9 BY MS. HIROSE:

10 Q. Good morning. Could you please state your
11 name for the record.

12 A. Jennifer B. Higgins.

13 Q. And could you state your place of employment.

14 A. I work at DHS, U.S. Citizenship and
15 Immigration Services.

16 Q. And what's your position there?

17 A. I'm the associate director for the refugee
18 asylum and international operations directorate.

19 Q. Thank you. So I introduced myself, but my
20 name is Mariko Hirose. I'm with the International
21 Refugee Assistance Project. I'm here with my
22 co-counsel here on this side of the room, and at the

1 "factual conclusions."

2 BY MS. HIROSE:

3 Q. Let's step back and just talk about what you
4 know about the Section 6(a) working group process.

5 MR. SNELL: Objection. Calls for a
6 narrative.

7 MS. HIROSE: You can just say, "objection."
8 Because otherwise it's a speaking objection.

9 MR. SNELL: I believe I'm entitled to state
10 the basis for my objection. I'm affording you the
11 opportunity to correct the mistakes in your questions.

12 MS. HIROSE: I don't think you are entitled
13 to.

14 MR. SNELL: Are you aware of any authority
15 not allowing me to state the basis of my objections?

16 MS. HIROSE: Yeah. We can talk about that
17 during a break.

18 MR. SNELL: Okay.

19 THE WITNESS: I'm sorry. Can you restate
20 your question.

21 BY MS. HIROSE:

22 Q. Yeah. Tell me what you know about the

1 Section 6(a) working group process.

2 MR. SNELL: Same objections.

3 THE WITNESS: It was an interagency working
4 group, as I said, with the parties that I already
5 described, and they were to look at the risks
6 associated with refugee processing and whether there
7 are any enhancements that can be made to ensure the
8 security and integrity of the process.

9 BY MS. HIROSE:

10 Q. And what was the process to come up with
11 Exhibit 2?

12 MR. SNELL: Objection. Vague.

13 THE WITNESS: I don't know the exact process
14 for everything that went into coming up with
15 Exhibit 2.

16 BY MS. HIROSE:

17 Q. Do you know anything about it?

18 A. Yes. I know that the working group, as I
19 said, conducted the review that I previously described
20 and that they made recommendations for enhancements
21 and that that was provided to the various principals
22 within the agencies.

1 Q. Who are the principals within the agencies?

2 A. The ones on the memo.

3 Q. You mean Rex Tillerson and Elaine Duke and
4 Daniel Coats?

5 A. That's correct.

6 Q. Did anyone other than those three receive the
7 Section 6(a) working group recommendations?

8 MR. SNELL: Objection. Lacks foundation.

9 THE WITNESS: I don't know everyone who
10 received those recommendations.

11 BY MS. HIROSE:

12 Q. Did you receive the recommendations?

13 A. I saw the report, yes.

14 Q. On the second page of Exhibit 2 -- withdraw
15 that.

16 Taking a step back, were you involved in the
17 drafting of Exhibit 2?

18 A. Yes.

19 Q. On the second page of Exhibit 2 on the first
20 full paragraph, there are two sentences -- at the end
21 of the second paragraph, two sentences that begin with
22 "During this review, the Secretary of State and

1 A. I don't know exactly what was happening with
2 admissions. I can tell you that under this guidance
3 we were prioritizing non-SAO nationals.

4 Q. And was that prioritization based on
5 recommendations in the Section 6(a) working group
6 report that you reviewed?

7 A. I don't -- sorry. Say that one more time.

8 Q. Sure. Was that prioritization -- was that
9 decision to prioritize grounded in the recommendations
10 of the Section 6(a) working group that you reviewed?

11 MR. SNELL: I'm going to object and ask the
12 witness to not answer on the ground of deliberative
13 process privilege. This is the final document. To
14 the extent there's any delta between recommendation
15 and what's the final product, that would show
16 deliberative process. In fact, even if there's not
17 you'd have to --

18 BY MS. HIROSE:

19 Q. Well, are there factual determinations or
20 recommendations within the Section 6(a) working group
21 that you can discuss? Factual determinations are not
22 within the deliberative process privilege.

1 MR. SNELL: That's not necessarily true.
2 Factual determinations can absolutely be encompassed
3 by the deliberative process privilege to the extent
4 that they reveal the deliberative process. You're in
5 effect asking what the recommendation of the 6(a)
6 working group was and is it the same here. That's
7 deliberative process material.

8 MS. HIROSE: Well, we disagree on that. We
9 are asking whether there were factual determinations
10 made by the 6(a) working group and whether they
11 supported the recommendations here. So I don't think
12 it meets the threshold for invoking deliberative
13 process, much less in a balancing test.

14 MR. SNELL: I guess I'm not clear by what you
15 mean by "factual determinations."

16 MS. HIROSE: Well, did you understand that
17 deliberative process doesn't apply to facts?

18 MR. SNELL: We just covered this. It does.

19 MS. HIROSE: So are you -- you're saying --
20 you're instructing the witness not to answer at all to
21 the question of -- to the question posed, which we can
22 repeat if you'd like.

1 MR. SNELL: Please repeat it.

2 BY MS. HIROSE:

3 Q. Now, was the decision to prioritize grounded
4 in the recommendations of the Section 6(a) working
5 group that you reviewed?

6 MR. SNELL: So I would instruct her not to
7 answer that question. To the extent you have discrete
8 factual questions you would like to ask her, you're
9 welcome to do so. But to the extent that these
10 factual questions are going to reflect what the
11 recommendation was, we would object.

12 BY MS. HIROSE:

13 Q. Did the 6(a) working group make a factual
14 determination that applications of non-SAO refugees
15 should be prioritized?

16 MR. SNELL: Objection. You're asking for the
17 recommendation and you're just labeling it a factual
18 determination.

19 MS. HIROSE: Are you instructing her not to
20 answer?

21 MR. SNELL: Yes.

22 BY MS. HIROSE:

1 Q. Did the 6(a) working group make factual
2 determinations that the agencies should review vetting
3 processes for the security advisory opinion countries?

4 MR. SNELL: Same objection and instruction.

5 MS. HIROSE: I'm going to show you what's
6 been marked as Plaintiff's Exhibit 8.

7 (Deposition Exhibit 8 was marked for
8 identification.)

9 BY MS. HIROSE:

10 Q. Okay. Do you recognize what's been handed to
11 you as Exhibit 8?

12 A. Yes, I'm familiar with it.

13 Q. Could you identify the document, please.

14 A. It was interim guidance provided to USCIS
15 staff on handling bona fide relationships.

16 Q. And how do you know that's what it is?

17 A. From the title.

18 Q. Do you know who was involved in drafting this
19 guidance?

20 A. I believe the refugee affairs division was
21 the primary drafter of the document.

22 Q. Were you involved in drafting the document?

1 MS. HIROSE: Does it make good sense to take
2 a quick break?

3 THE WITNESS: Sure.

4 MR. SNELL: That's fine with us.

5 MS. HIROSE: Thank you. If we could just
6 take a 5- to 10-minute break.

7 (A recess was taken from 10:38 a.m.
8 to 10:53 a.m.)

9 BY MS. HIROSE:

10 Q. So we're going to go back to Exhibit 2. We
11 had started by talking about the second paragraph on
12 the very first page.

13 A. Uh-huh.

14 Q. And it said that -- particularly the sentence
15 that said the Section 6(a) working group identified "a
16 number of additional ways to enhance the refugee
17 screening and vetting processes." So what were those
18 additional ways that the Section 6(a) working group
19 identified?

20 A. So as I said before, I don't know if there's
21 an exact correlation between what the working group
22 identified with what's in the addendum, but my

1 understanding is what's in the addendum is much of
2 what the working group identified. I just don't know
3 if it's exact.

4 Q. So turning to the addendum, which starts on
5 what's marked as Page 10 of 41 at the very top of
6 Exhibit 2 --

7 A. Uh-huh.

8 Q. -- did the working group identify the bullet
9 points under "Application Process" under "Additional
10 Procedures for Refugee Applicants Seeking Resettlement
11 in the United States"?

12 A. Again, I don't know if there's an exact
13 correlation, but I know they identified the basic
14 parameters of what's described there.

15 Q. Had they identified both the "Increased Data
16 Collection" and the "Enhanced Identity Management"?

17 A. Yes.

18 Q. Did the working group identify the bullet
19 point "Fraud Detection and National Security" under
20 "Interview and Adjudication Process"?

21 A. So, again, I'm a little uncomfortable about
22 going line by line and saying -- because I'm not sure

1 if there's an exact correlation. I can tell you that
2 the working group provided recommendations and that
3 was then incorporated into this document. Whether
4 there were other things that came into it while this
5 was being drafted, I just don't know.

6 Q. Okay. Did they provide generations behind
7 what's listed under "Interview and Adjudication
8 Processes?"

9 A. As I recall, the group made some
10 recommendations related to the application process,
11 the interview process, and systems checks. But,
12 again, whether there's an exact match, I don't know.
13 Those were the broad buckets.

14 Q. Did the Section 6(a) working group identify
15 the section that's labeled "Additional Review Process
16 for Certain Categories of Refugee Applicants"?

17 MR. SNELL: Objection. Vague.

18 THE WITNESS: I don't even know where you
19 are. Oh.

20 BY MS. HIROSE:

21 Q. The next page, Page 12 of 41 at the top.

22 (The witness reviewed Exhibit 2.)

1 (The witness reviewed Exhibit 2.)

2 THE WITNESS: It refers to the "we continue
3 to have concerns" in the prior sentence. So to
4 address the concerns that they continue to have,
5 they're conducting a detailed threat analysis.

6 BY MS. HIROSE:

7 Q. Did the 6(a) working group identify these
8 concerns specific to SAO nationals?

9 MR. SNELL: Objection. Seems to be calling
10 for deliberative material.

11 Can you rephrase the question?

12 MS. HIROSE: That's a yes or no question.

13 MR. SNELL: Well, that doesn't mean that I
14 can't --

15 BY MS. HIROSE:

16 Q. Did the working group identify concerns
17 specific to SAO nationals?

18 MR. SNELL: You're asking if the working
19 group identified the same concerns as identified in
20 the memo?

21 MS. HIROSE: I'm asking if the concerns that
22 the memo talks about are concerns identified by the

1 6(a) working group.

2 MR. SNELL: Yeah. That seems to be
3 deliberative material. I would ask the witness not to
4 answer that question. I would also note for the
5 record that we've spent an inordinate amount of time
6 both on the 6(a) working group and on just the general
7 apparent policy behind this memo, which is not what
8 discovery was authorized for. So I would like that
9 objection to be reflected in the record.

10 MS. HIROSE: Sure. We think that we need to
11 understand what the purpose of the memo was in order
12 to get some understanding how defendants implemented
13 it and whether the same suspension was in place in
14 another form now. But your objection has been noted.

15 I'm going to ask a few more questions, and if
16 you, you know, object and instruct the witness not to
17 answer --

18 MR. SNELL: If the questions --

19 MS. HIROSE: Well --

20 MR. SNELL: -- you can assume that the
21 objection just stands.

22 MS. HIROSE: We will make the record, and we

1 will try to call the court today if we can.

2 MR. SNELL: I'm sorry. I wasn't instructing
3 her not to answer on grounds of relevance, just for
4 the record. I'm just making it known that I view
5 these questions wildly outside the bound of discovery
6 that was authorized in this limited jurisdictional
7 dispute.

8 BY MS. HIROSE:

9 Q. We were just talking about the "concerns"
10 language in this paragraph. What were the concerns?
11 In the first sentence of that paragraph you pointed to
12 that language that says, "We continued to have
13 concerns."

14 A. I can't speak to the specific concerns that
15 the cabinet head may have had.

16 Q. You don't know what they are?

17 A. I don't know what their specific concerns
18 were.

19 Q. Do you know generally what their concerns
20 were?

21 A. I think, as described in the memo, there was
22 concerns that these were higher risk countries in

1 which an updated threat assessment had not yet been
2 conducted and that that needed to be conducted in
3 order to understand what risk was involved with
4 continuing to process those cases and whether new
5 enhancements were needed to address those risks.

6 Q. On the last page of Exhibit 2, Page 13 of 41,
7 there's a section, "Form I-730 Refugee
8 Following-to-Join Processing."

9 A. Do you mean with the addendum of the last
10 page?

11 Q. Yes. The last page of the addendum.

12 A. Okay. Sorry.

13 Q. Was that an issue identified by the 6(a)
14 working group?

15 A. Can you be more specific in terms of what you
16 mean by "issue"?

17 Q. Sure. So we've been talking about how the
18 working group identified a number of ways to enhance
19 refugee screening and vetting processes. So was the
20 form I-730, refugee following-to-join processing, one
21 of the ways that 6(a) working group recommended?

22 A. As I recall, the 6(a) working group

1 identified a misalignment in vetting between I-590
2 applicants and -730 applicants of a risk, yes.

3 Q. So you've recalled the 6(a) working group
4 identifying the misalignment between I-730 refugees
5 and other refugees, and the topics under system
6 checks, interviews and refugee processes and
7 application processes; right?

8 A. So as I said before, I recall that they
9 identified recommendations within each of those three
10 headings, but I'm not sure if they match exactly with
11 what is contained within the subheadings.

12 Q. And you don't remember, one way or another,
13 if the working group identified additional review
14 process?

15 A. I don't remember if that was part of their
16 final recommendation.

17 Q. Do you remember anything else that was part
18 of a Section 6(a) working group recommendation?

19 A. No, I think we covered it.

20 Q. Earlier, you -- I asked you whether you were
21 ever detailed to the White House, and you said no?

22 A. Uh-huh.

1 Q. Did you ever work at the White House in some
2 capacity?

3 A. No.

4 Q. Did the White House have any involvement in
5 the drafting of Exhibit 2?

6 A. I don't know if they were involved or not.

7 Q. Did you ever talk to anyone from the
8 White House in relation to the issuance of Exhibit 2?

9 A. No. My communications were with the
10 department.

11 Q. Did you talk with the White House about
12 Exhibit 2 at all?

13 A. Not that I recall. My conversations were
14 with the department.

15 Q. Is that also true prior to the issuance of
16 Exhibit 2? Did you talk to anyone at the White House
17 about drafts of Exhibit 2?

18 A. All my conversations related to Exhibit 2
19 were with the department and interagency colleagues,
20 but I don't recall anyone from the White House being
21 involved in those conversations.

22 Q. Have you heard any suggestions that [REDACTED]

1 refugee applicants were specifically of concern?

2 A. Yes, I have heard people describe those
3 concerns.

4 Q. Were those discussions in relation to
5 Exhibit 2?

6 A. Yes, I believe they were.

7 Q. Can you tell me about the discussion.

8 MR. SNELL: Objection. No, she cannot.
9 Again, this is deliberative process material. You're
10 asking for her to describe discussions regarding a
11 concern.

12 MS. HIROSE: A concern that's written about
13 in the memo. We've been discussing various concerns
14 already.

15 MR. SNELL: Well, I understand that I gave
16 you some leeway for the last set of questions, but now
17 you're asking about who had concerns and what about.
18 I mean this is predecisional deliberative material,
19 and I would ask the witness not to answer it with
20 respect to information -- with respect to divulging
21 information that would reveal predecisional
22 deliberative material.

1 BY MS. HIROSE:

2 Q. Was concerns about [REDACTED] one of the concerns
3 that is referenced in the first full paragraph, Page 8
4 of 41, in Exhibit 2?

5 A. Again, I don't know specifically what the
6 three cabinetists explicitly meant by those concerns,
7 but as I said before, there was a belief that
8 individual threat assessments needed to be done for
9 the SAO countries to determine whether there was a
10 greater risk involved with processing those cases and
11 identifying perhaps additional enhancements beyond
12 what was already contemplated to address those risks.

13 Q. Did you draft this paragraph, the first full
14 paragraph, on Page 8 of 41?

15 A. Again, I don't remember if I -- I edited it.
16 I provided input into it. Absolutely.

17 Q. Are you aware of the NPR piece in which
18 Barbara Strack talks about the process of drafting and
19 issuing Exhibit 2?

20 A. I am aware she spoke to NPR, but I have not
21 heard it.

22 Q. Are you aware of what she said on the NPR

1 piece about this?

2 A. No.

3 MR. SNELL: For the record, is "NPR"
4 referring to National Public Radio?

5 MS. HIROSE: Yes. Thank you. Yes. National
6 Public Radio.

7 Could you mark this as Plaintiff's
8 Exhibit 22.

9 (Deposition Exhibit 22 was marked for
10 identification.)

11 MS. HIROSE: We're going to go to Page 46.
12 So I apologize for the poor quality of this. If you
13 could just read to yourself Page 46, starting with "My
14 impression from Barbara," and then down to the bottom
15 of the page. And let me know when you're done.

16 (The witness reviewed Exhibit 22.)

17 THE WITNESS: Okay.

18 BY MS. HIROSE:

19 Q. Is what Barbara Strack talks about here
20 familiar to you?

21 A. Yes.

22 MR. SNELL: Objection. Lacks foundation.

1 BY MS. HIROSE:

2 Q. Can you describe in which ways it's familiar?

3 A. As I said, there was discussion about concern
4 about the SAO nationalities and whether there should
5 be threat assessments done specific to the countries
6 to determine whether there were any need for
7 additional enhancements beyond what was already being
8 contemplated.

9 From my perspective, that's what she
10 describes herein.

11 Q. So you agree with what Barbara Strack says
12 here on this page?

13 MR. SNELL: Objection. Foundation.

14 THE WITNESS: I'm not sure it's precise, but
15 it's similar to what I described.

16 BY MS. HIROSE:

17 Q. Can you explain in what ways you don't think
18 it's precise?

19 A. The fact that it says, you know, that it's
20 attributing it to the White House is very general.
21 Our conversations were not directly with the White
22 House. They were through DHS. So it's difficult for

1 me to confirm whether that is accurate or not.

2 Q. Who at DHS?

3 A. The DHS policy colleagues. Senior advisors
4 within the department. Those were primarily -- chief
5 of staff. Those were primarily the individuals who
6 were involved.

7 Q. And did you hear from one of them that they
8 heard from the White House?

9 A. Yes.

10 Q. From who?

11 A. I don't recall who indicated that there had
12 been conversations with the White House. I mean,
13 again, we're using a nebulous term. Individuals.

14 Q. And is it correct that the working group
15 recommended that refugee process restart for all
16 nationalities?

17 MR. SNELL: Objection to the scope. We're
18 back to where we were. I would ask the witness not to
19 answer to the extent that they would reveal what the
20 recommendation of the working group was.

21 MS. HIROSE: She already said she agreed.
22 It's okay. I understand your objection to that

1 particular question.

2 Q. And is it correct -- you said that you know
3 that the White House was in touch with certain people
4 regarding this. Did you hear that the White House did
5 not like the conclusion of the working group review?

6 MR. SNELL: Objection. This is also
7 deliberative process, and now we're also starting to
8 get into Presidential communications privilege because
9 we're talking about, I assume, advisors to the
10 president and what their thoughts were. So I would
11 ask the witness not to answer that question.

12 MS. HIROSE: Well, this is the White House
13 influencing a memo that's been issued by the agency.
14 So...

15 MR. SNELL: I would ask the witness not to
16 answer the question.

17 BY MS. HIROSE:

18 Q. Did you hear about the White House wanted the
19 conclusion of the review to be changed?

20 MR. SNELL: Same objection. Same
21 instruction.

22 BY MS. HIROSE:

1 Q. Were you told that there's a particular
2 concern about [REDACTED] nationals from the White House?

3 MR. SNELL: Same objection and same
4 instruction. And I would also reiterate that we
5 haven't gotten to implementation of the agency memo,
6 which is what I understood this was about, as well as
7 implementation of the PI.

8 BY MS. HIROSE:

9 Q. Do you know of any reasons why there would be
10 concerns about [REDACTED]

11 MR. SNELL: Objection. Vague.

12 THE WITNESS: Yes. There have been instances
13 of [REDACTED] nationals who have been engaged in terrorist
14 activities, and certainly in terms of law enforcement
15 investigations and national security investigations,
16 [REDACTED] nationals are often represented in those
17 investigations.

18 BY MS. HIROSE:

19 Q. Was this prior to the 120-day review finding?

20 A. So as part of the 120-day review, that was
21 part of the issue, was the need to be able to do a
22 full-threat assessment of each of the countries and to

1 take a look at ongoing law enforcement investigations
2 and past law enforcement investigations.

3 Q. Within the 120-day review?

4 A. Sorry. After the -- after the 120-day review
5 in terms of why the 90-day review was pursued was to
6 ensure that those threat assessments were conducted on
7 SAO countries and to ensure that information like
8 ongoing law enforcement investigations were being
9 considered.

10 Q. But that was not a determination made by a
11 120-day review committee?

12 A. Right. What I'm saying is that the 90-day
13 review was put in place to be able to do that
14 assessment and to make sure that information was
15 considered and reviewed.

16 Q. And what you said just now about the concern
17 about the [REDACTED] refugees in particular, is that an
18 issue that was discussed within the Department of
19 Homeland Security prior to the issuance of Exhibit 2?

20 MR. SNELL: I would object to that question
21 and ask the witness not to answer on the grounds of
22 deliberative process privilege.

1 BY MS. HIROSE:

2 Q. If [REDACTED] were the concern, why did they
3 suspend processes of all SAO nationals?

4 MR. SNELL: Objection. Lacks foundation.

5 THE WITNESS: I don't believe that [REDACTED]
6 were the only concern. I believe the concern was that
7 threat assessment hadn't been conducted for all of the
8 SAO nationals and that that was required before a
9 final decision could be made on how to proceed.

10 BY MS. HIROSE:

11 Q. And what's the basis of your belief?

12 A. Based on the conversations that I had in
13 terms of developing this memo.

14 Q. And those were the conversations you had with
15 your DHS colleagues. Anyone else?

16 A. As part of the interagency process. I mean
17 the memo is very clear that the threat assessments
18 need to be done for these countries. That's the court
19 foundation for why I believe that to be the case.

20 Q. Did the conclusion come from the White House?

21 MR. SNELL: Objection. Instruct her not to
22 answer on the grounds of deliberative process

1 privilege and the Presidential communications
2 privilege.

3 BY MS. HIROSE:

4 Q. Other than Exhibit 8, which we talked about,
5 just the interim guidance, were there other ways in
6 which you implemented the agency memo?

7 MR. SNELL: Objection. Vague.

8 THE WITNESS: I don't know whether there was
9 additional guidance beyond this that was distributed.

10 BY MS. HIROSE:

11 Q. Were you involved in drafting any other
12 guidance on the agency memo?

13 A. Other than Exhibit 8 and the memo itself?

14 Q. Right.

15 A. I don't remember.

16 Q. Did you issue any other instructions
17 regarding implementing that agency memo?

18 A. I don't believe so.

19 Q. Did you hold meetings on the implementation
20 of the agency memo?

21 A. I don't know if we had specific meetings
22 related to the implementation, but I meet with my

1 A. Talking with the state department about
2 whether there were additional locations where cases
3 could be presented and ready for interview. Whether
4 we could ensure that we could get Visas to go to those
5 locations in time. Whether we could ensure officers
6 got vaccinations in order to go to those locations in
7 time. Whether there were SAO nationals who were part
8 of our circuit rides who were -- had cases ready for
9 interview in the locations we were already going. So
10 a variety of different things with whom one would have
11 to be discussed.

12 Q. What were the additional countries that you
13 were contemplating adding in those discussions?

14 A. I don't know what was being discussed or
15 contemplated in terms of the countries. The
16 instruction was trying to figure out if there were
17 additional SAO national cases that could be added to
18 the circuit ride.

19 Q. And also whether there were additional
20 locations that could be added to the second quarter
21 circuit rides?

22 A. Certainly.